

65. Taitz and her plaintiffs were the whistleblowers against Obama. Through his actions Land engaged in intimidation of a whistleblower in order to cover up crimes committed by Obama.

66. Members of the media used demeaning and defamatory comments by Land in order to assassinate her character. In a number of cases attorneys were not willing to work with her because of demeaning comments and sanctions assessed by Land

67. Taitz suffered a damage of \$20, 000.

68. All of the Plaintiffs suffered damage, as Lands ruling was used by other courts, and other plaintiffs were denied their right for redress of grievances against Obama's usurpation of the U.S. Presidency, when U.S. attorneys and AG attorneys used Land's decision to attack Taitz and others in different courts.

69. All of the defendants (aside from defendants Feinstein and Emken) acted with an intent to defraud. Plaintiffs were intended victims and foreseeable victims. Plaintiffs suffered financial damages, defamation, humiliation, harassment and emotional distress as a result of fraud committed by the Defendants.

g) Aiding and Abetting Fraud by Defendant Patrick R. Donahoe

70. Taitz submitted to Donahoe a complaint, which provided Donahue with evidence of Obama committing fraud and using a forged postal stamp on his alleged Selective Service certificate. Namely, U.S. postal stamp which was affixed to Obama's Selective Service certificate contained only two digits "80" , while other documents from 1980 showed a 4 digit postal stamp "1980".

71. Additionally Taitz forwarded to Donohue a video-tape with presentation by Sheriff Joseph Arpaio of Maricopa county Arizona, showing how Obama's selective service certificate was forged and how 2008 postal stamp was cut in half, reversed and used as 1980 stamp with only two digits "80" .

Donahue had in front of him evidence of the most serious crime being committed: most serious breach of the U.S. national Security and use by a foreign national a forged U.S. postal stamp in order to get into the position of the U.S. President.

Donahoe became criminally complicit when he took no action and covered up this crime.

h) Fraud by defendant CNN

72. In and around of April of 2011 CNN issued a report "Busting The Birther Conspiracy Theory. President's long form birth certificate released more than a year ago". Exhibit 11 A video clip of the report can be seen on You-tube <http://us.mg6.mail.yahoo.com/neo/launch?.rand=71sdc0s28p5ea>. Within the report CNN placed a microfilm of a birth certificate from the state of Hawaii claiming it to be a birth certificate of Obama. Upon magnification of the image, it is clear that this is not a microfilm of Obama's birth certificate, but an image of a certificate of a completely different person.(Exhibit 12). CNN, who claims to be a reputable news organization acted with a breathtaking malice, fraud and criminality. CNN, through its' agents, its producers, directors, anchor men and other employees and agents placed a microfilm of a birth certificate of another person, claiming it to be a microfilm of Obama's birth certificate.

73. Public believed the fraud committed by CNN, believed that indeed that was the microfilm of Obama's birth Certificate.

74. As a result multiple members of the public attacked Plaintiffs, as birthers, particularly Attorney Orly Taitz, who led the legal actions challenging Obama, and subjected them to abuse, harassment, intimidations, threats of bodily harm.

75. Damages suffered by the Plaintiffs are directly, actually and proximately related to fraud committed by CNN.

SECOND CAUSE OF ACTION

RICO

Predicate crime-Fraud

76. Plaintiffs incorporate by reference all prior paragraphs as it relates to FRAUD as if fully pled herein.

"Obama for America" -Racketeering Influenced Corrupt Organization

Barack Hussein Obama created "Obama For America" as his fundraising organization for his Presidential run. At all times Obama was not eligible for the US presidency and he used "Obama for America" as a vehicle to defraud American citizens and get into the position of the U.S. President while using forged documents.

DE-FACTO RICO ENTERPRISE, "ASSOCIATION-IN-FACT"

RICO ENTERPRISE

77. Between 2007-2012 defendants acted together or in groups and created an "association- in- fact" enterprise, which is sufficient for RICO, even if "Obama for America" was not a RICO enterprise. Defendants acted directly or indirectly, personally or through agent or agents, employed the same or similar methods of commission with the purpose to defraud, utter forged documents,

commit wire and mail fraud, unlawfully procure citizenship and nationalization, obstruct justice and intimidate, harass, defame, slander and otherwise retaliate against witnesses, victims, informants and whistleblowers. Plaintiffs were victims of the acts of the racketeering or the acts of racketeering were otherwise interrelated by distinguishing characteristics and were not isolated events.

PATTERN OF ONGOING RACKETEERING ACTIVITY

78. Fraud committed by defendants, who were acting directly or indirectly and committed fraud, which was on going from 2007 until now, for over four years. Actions by the defendants established a pattern of racketeering activity within the meaning of 18 U.S.C. §1962(c), in that their common purpose was to defraud, the common result was to defraud. Plaintiffs were victims of the acts of racketeering and the acts of racketeering were otherwise related by distinguishing characteristics and were not isolated events.

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THIRD CAUSE OF ACTION

RICO-MAIL AND WIRE FRAUD

Plaintiff includes, by reference, all prior paragraphs as if fully pled herein

79. Defendant Obama committed mail and wire fraud, when he posted on the Internet in and around April 27, 2012 a paper, which he claimed to be a true and correct copy of his long form birth certificate.

80. Obama committed mail and wire fraud, when he posted on the Internet on his site "Fight the smears" a paper, which he claimed to be his short form birth certificate.

81. Obama knew that he is committing fraud and intended to defraud in order to continue usurping the position of the U.S. President.

82. Obama committed fraud when he sent to 50 states in 2007-2008, as well as in 2011-2012 his declarations of candidacy. Obama used mail or other instrumentalities of the Interstate commerce to commit such fraud.

83. In and around November 19, 2011 Obama committed mail and wire fraud, when he through his agent, Deputy Campaign Manager Juliana Smoot, personally attacked and defamed Taitz: "RELEASE THE MUGS

By Julianna Smoot, Deputy Campaign Manager on November 19, 2011.

Yesterday, four Republicans in the New Hampshire State House allowed a hearing requested by Orly Taitz, the notorious dentist-lawyer-birther who wants President Obama officially removed from the state's primary ballot. So in honor of conspiracy theorists everywhere, we're re-releasing the campaign's limited-edition "Made in the USA" mugs. There's clearly nothing we can do to satisfy this crowd—or anyone else who insists on wasting time and energy on nonsense like this. But when it starts to make your head hurt, I've found the best remedy is to have some tea in my "Made in the USA" mug. Works like a charm. I recommend Earl Grey."

84. Obama knew that Taitz is submitting to different courts and elections commissions, including Ballot Law commission in New Hampshire true and correct information showing Obama using all forged IDs and a stolen social Security number.

85. Obama acted with malice and using his employee, his assistant campaign manager he made a fraudulent statement, which he forwarded to millions of people via e-mails and other instrumentalities. This fraudulent statement was made to cover up fraud committed by him and in order to defame Taitz.

FOURTH CAUSE OF ACTION

RICO

PREDICATE CRIME-MISPRISION OF FELONY-

United States Code Title 18 § 4 Misprision of Felony

(MISPRISION OF SOCIAL SECURITY FRAUD COMMITTED BY OBAMA)

86. Title 18, §4 Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States is guilty of the federal crime of misprision of felony, shall be fined not more than \$500 under this title or imprisoned not more than three years, or both. (all defendants aside from Defendants Feinstein, Emken, Logan)

- a. Defendants were put on notice of felony of Social Security Fraud, namely Barack Obama using a stolen Connecticut Social security number xxx-xx-4425, which was never assigned to Obama according to E-Verify and SSNVS
- b. Defendants committed Misprision of Felony by concealing this fact and not making it known to a judge or other person in civil or military authority.

FIFTH CAUSE OF ACTION

RICO

PREDICATE CRIME-MISPRISION OF FELONY

United States Code Title 18 § 4 Misprision of Felony

(MISPRISION OF ELECTIONS FRAUD BY OBAMA)

87. Defendants received from Plaintiffs evidence of Obama committing elections fraud by claiming to be a legitimate candidate for the U.S. Presidency, while in fact not being eligible and being on the ballot by virtue of fraud and by false pretenses, while using forged identification papers: forged birth certificate, forged selective service certificate, and forged Social Security ID.

Defendants committed Misprision of Felony by concealing this fact and not making it known to a judge or other person in civil or military authority.

SIXTH CAUSE OF ACTION

RICO

PREDICATE CRIME-MISPRISION OF FELONY

United States Code Title 18 § 4 Misprision of Felony

**(MISPRISION OF USE OF A FORGED POSTAL STAMP ON THE
SELECTIVE SERVICE CERTIFICATE BY OBAMA)**

Plaintiffs incorporate by reference all prior paragraphs as if fully pled herein

88. Defendants received from Plaintiffs evidence of Obama using a forged postal stamp on the Selective service certificate he is using. Defendants committed Misprision of Felony by concealing this fact and not making it known to a judge or other person in civil or military authority.

SEVENTH CAUSE OF ACTION

VIOLATION UNDER THE COLOR OF AUTHORITY

OF 1ST/14TH AMENDMENT RIGHT-FREEDOM OF FREE

SPEECH OF THE U.S. CONSTITUTION

(AGAINST DEFENDANTS FEDERAL AND STATE AGENCIES)

89. Plaintiffs incorporate by reference all prior paragraphs as if fully pled herein.

90. First amendment of the U.S. Constitution and 14th Amendment as available to the States prohibits violation of the Free Speech by the Federal and State governmental agencies.

91. Lawful voting represents the highest embodiment, the highest manifestation of the Free Speech. Any action by the Federal or state agency is seen under the "Highest Scrutiny " test.

92. When representatives of Federal or State agencies under color of authority are aiding and abetting a criminal with forged IDs to run for the U.S. Presidency, they de- facto rob the citizens of their most sacred right to a political free speech, as they enable the usurpation of the U.S. Presidency by a foreign citizen with all forged Identification Papers, they rob the citizens of their right to free election, turning elections into a sham, a well choreographed Hollywood production without any substance behind it.

93. As an actual and proximate result of the actions by the Defendants, the First /Fourteenth Amendment right to free speech of the Plaintiffs was violated.

94. First amendment right for Political Free Speech of Plaintiff Taitz was also violated by Defendant Judge Clay D. Land.

Taitz, as an attorney, brought in front of Land two legal actions on behalf of members of the U.S. military, seeking verification of legitimacy of Obama in light of his use of a forged Birth Certificate, forged Selective Service Certificate and fraudulently obtained Social Security number.

Land desired to silence political opposition to Obama regime.

Land abused his judicial discretion and abused Taitz and her clients verbally, psychologically and financially.

Land's actions were aimed to silence political speech against Obama's usurpation of the U.S. Presidency.

Land frivolously and callously attacked Taitz, claiming that bringing a legitimate legal action against Obama is somehow frivolous, and used his opinion and sanctions against Taitz as means of intimidation of political dissidents, civil rights attorneys and members of the U.S. military who were seeking Obama's removal from office due to his use of forged IDs.

95. Actions by the Defendants had a chilling effect on the free political speech of the Plaintiffs and every political dissident in the U.S.

96. Damages to civil right of political free speech, as well as financial damage of \$20,000, associated costs and fees, legal fees, damage as a result

of defamatory statements in the opinion by Land, psychological damages and emotional distress associated with actions by Land.

EIGHTH CAUSE OF ACTION

VIOLATION OF THE FIRST AMENDMENT / 14TH AMENDMENT

RIGHT FOR REDRESS OF GRIEVANCES UNDER COLOR OF

AUTHORITY

(against defendants Federal and State Agencies and Defendant Land)

97. Plaintiffs brought their grievances relating to Obama's use of forged and fraudulently obtained IDs to Defendant's officials of the Federal and State governments.

98. Defendants violated Plaintiffs rights, did not provide a redress of Plaintiffs grievances and were complicit in Obama's violations of Plaintiff's rights.

99. Plaintiffs suffered damages as a result of violations by the Defendants.

Additionally Plaintiff Taitz suffered a violation of her right for redress of grievances by Defendant Land, who as a Presiding Judge arbitrarily refused to address grievances by Taitz's clients claiming abstention and attacked Taitz and her clients with defamatory statements and sanctions in order to

intimidate other dissidents and civil rights attorneys and prevent them from seeking a redress of grievances against Obama's usurpation of the U.S. presidency and against him placing his name on the ballot in 2012 election.

NINETH CAUSE OF ACTION

VIOLATION OF 5TH AMENDMENT OF DUE PROCESS AND 14TH AMENDMENT EQUAL PROTECTION RIGHTS OF THE PLAINTIFFS UNDER COLOR OF AUTHORITY.

100. Plaintiffs incorporate by reference all prior paragraphs.

Plaintiffs were entitled to Due Process and Equal Protection.

Their rights were infringed upon by defendants Federal and State Agencies.

While State Agencies routinely removed from the ballots ineligible candidates, Defendants refused to do that with candidate Obama.

101. Additionally Plaintiff Taitz was denied her Due Process and Equal Protection rights by Judge Clay D. Land when he denied her due process and sanctioned her without giving her due process hearing on the issue of sanctions.

TENTH CAUSE OF ACTION

DEFAMATION

Plaintiff includes, by reference, all prior paragraphs as if fully pled herein

102. Obama directly and through his agents was committing fraud, while at the same time defaming and harassing Taitz and other plaintiffs, calling them "a side show" and "carnival barkers". On April 27, 2012 he released a forgery claiming it to be a true and correct copy of his long form birth certificate and simultaneously defamed plaintiffs calling them "carnival barkers" and "a side show". Obama acted with malice and made a defamatory statement, which was understood by others as relating to plaintiffs, which lowered Plaintiff's standing in the community and caused damages.

103. Plaintiffs suffered defamation and humiliations, being attacked as "birthers", were called crazy, while they were telling the truth about the fact that defendant Obama is committing elections fraud and is using and uttering forged documents as proof of his eligibility for the U.S. Presidency.

104. Plaintiff Taitz received multiple death threats from Obama supporters who do not believe that their "messiah" is capable of committing elections fraud and use forged documents

105. From 2008 campaign until now Taitz and other Plaintiffs and patriots of this country suffered a total of nearly four years of humiliation, defamation,

slander, persecutions, harassment, sanctions, tampering with vehicles, attacks on their families by some of the defendants.

106. John Avalon, a reporter for Daily Beast, a writer, contributor to CNN and Newsweek engaged in systemic defamation of Taitz.

Avlon started by yelling and screaming at her and her client former U.N. Ambassador Alan Keyes, while appearing together on CNN.

Later Avlon contacted Taitz and told her that he apologizes for his behavior and would like to fly from New York to California and do an in depth interview.

Taitz agreed to give an interview to Avlon.

Avlon flew to California and interviewed Taitz for about two hours, at which time Taitz provided him with the information relating to fraud and forgery in Obama's IDs, which is described in paragraphs 1-23 herein.

Additionally Avlon asked her for a number of books and video tapes Taitz had on the subject, which Taitz gave him.

Avlon never published any information that Taitz gave him regarding Obama and continued defrauding the public by claiming that Obama is legitimate for the position of the President.

Additionally Avlon published a book called "Wingnuts", where he included Taitz among other politicians, that he called "Wingnuts".

107. When Taitz ran for the U.S. Senate in 2012 and according to 4 consecutive polls by Public Policy Polling, only one day before the election, Avlon published in Daily Beast a hit job defamatory article about Taitz, which was republished by multiple other magazines and newspapers.

Avlon knew that no judge have ruled on the merits of the case.

Avlon knew that Sheriff Arpaio held multiple press conferences, where he presented evidence showing Obama using forged birth certificate and Selective service certificate

Avlon had evidence that Obama is using a Connecticut Social Security number, which was not assigned to him.

Avlon knew that no judge has ever seen an original birth certificate for Obama, an original application for Selective Service and an original application for Connecticut Social Security number that Obama is using, while copies were found to be forgeries by Sheriff Arpaio and other experts. Avlon acted with malice, aided and abetted and attacked and defamed Taitz with a clear goal of derailing her campaign.

Avlon was criminally complicit with Obama and viciously misrepresented the truth defamed Taitz in order to aid and abet Obama in cover up of Obama's elections fraud and Obama's forged IDs. On June 5th 2012, the elections day for the U.S. Senate he wrote an article in "Daily Beast" (Exhibit 26) He wrote:

"I've met Taitz, debating her on-air once and spending an hour at her law office/dental practice in the hills of Rancho Santa Margarita while I was researching Wingnuts. She is not unintelligent and is almost charmingly insane, proudly showing off prominent alleged Facebook friends and then comparing Obama to Stalin, all while passing over hundreds of pages of Xeroxed documents she has sent to governors of all 50 states and the entire U.S. Senate. The packet details accusations including impersonation of a military officer, libel, defamation of character, harassment, breaking into the computer system of the Supreme Court, voter fraud, and forgery, concluding: "Verify the above facts brought forward by me and demand Obama/Soetoro's immediate resignation or removal from office due to fraud and constitutional inability. National security and national survival depends on your expedient actions ..."

In other words, nut-balls. Only Taitz as a candidate for U.S. Senate would make Christine O'Donnell look like Henry Clay. She would make Sharron Angle look like Daniel Webster. Donald Trump seems a model of restraint by comparison."

Avlon referred to Taitz as a "national embarrassment", "wing nut", "nut ball", "radioactive destruction", "crazy", "freak beat", "fringe", "insane", "clownishly unelectable candidate".

108. As most readers of "Daily Beast" and "Forbes magazine" do not follow this litigation, they believe that those magazines are reputable publications. They believe that reporters are legitimate reporters who do not commit journalistic malpractice and who do not defame individuals. The public believed that Avlon and other reporters, such as Kevin Underhill from Forbes, who republished Avlon's hit piece, are writing the truth.

109. Taitz standing in the community was affected, as a result of defamation by Avlon and other members of the media listed herein.

110. Public clearly understood that statements were made about Taitz, understood those statements to be true and Taitz standing in the community was affected and reduced as a result of actions by Avlon. Damages suffered by Taitz are actually and proximately related to actions by Avlon.

DEFAMATION BY "DAILY BEAST"

111. Plaintiffs incorporate by reference all prior paragraphs as if fully pled herein.

Defamatory statements by Avlon were made on the pages of "Daily Beast" by Avlon as a writer for Daily Beast.

"Daily Beast" is vicariously liable for defamation of Taitz which was perpetrated by the writer of "The daily Beast" on the pages of "The Daily Beast".

DEFAMATION BY KEVIN UNDERHILL, WRITER FOR "FORBES"

112. Plaintiffs incorporate by reference all prior paragraphs, as if fully pled herein.

Kevin Underhill, writer for "Forbes" wrote a defamatory article about Taitz .

Underhill wrote "Finally, and this is why I started this thing in the first place, famed Birther-activist and naturalized-Moldovan-lawyer-dentist Only Taitz is running for the Senate